

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Columbia

United States of America

v.

Ronald L. Sandlin

Case No.

1:21-mj-00129-Zmf

2:21-mj-110-DJA

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 6, 2021 in the county of _____ in theDistrict of Columbia, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. 231(a)(3)

Obstructing Law Enforcement Engaged In Official Duties Incident to Civil Disorder

18 U.S.C. 231(a)(3)

Obstructing Law Enforcement Engaged In Official Duties Incident to Civil Disorder

18 U.S.C. 1752(a)(1)&(2)

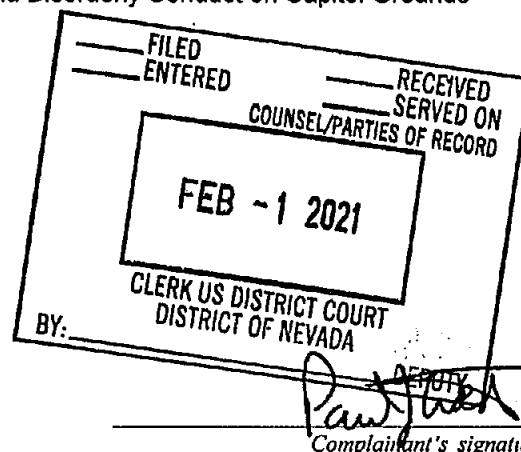
Knowingly Entering or Remaining in any Restricted Building or Grounds Without Lawful Authority

40 U.S.C. 5104(e)(2)(D)(E)(F)&(G)

Violent Entry and Disorderly Conduct on Capitol Grounds

This criminal complaint is based on these facts:

See attached statement of facts.

☒ Continued on the attached sheet.

Complainant's signature

Paul J. West, FBI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
Telephone (specify reliable electronic means).Date: 01/20/2020

2021.01.20
14:28:18 -05'00'

Judge's signature

City and state: Washington, D.C.

Zia M. Faruqui, U.S. Magistrate Judge

Printed name and title

STATEMENT OF FACTS

Your affiant, Paul J. West, is a Special Agent with the Federal Bureau of Investigation. As a Special Agent, I am authorized by law or by a Government agency to engage in or supervise the prevention, detention, investigation, or prosecution of violations of federal criminal laws.

The U.S. Capitol is secured 24 hours a day by U.S. Capitol Police. Restrictions around the U.S. Capitol include permanent and temporary security barriers and posts manned by U.S. Capitol Police. Only authorized people with appropriate identification are allowed access inside the U.S. Capitol. On January 6, 2021, the exterior plaza of the U.S. Capitol was also closed to members of the public.

On January 6, 2021, a joint session of the United States Congress convened at the United States Capitol, which is located at First Street, SE, in Washington, DC. During the joint session, elected members of the United States House of Representatives and the United States Senate were meeting in separate chambers of the United States Capitol to certify the vote count of the Electoral College of the 2020 Presidential Election, which had taken place on November 3, 2020. The joint session began at approximately 1:00 p.m. Shortly thereafter, by approximately 1:30 p.m., the House and Senate adjourned to separate chambers to resolve a particular objection. Vice President Mike Pence was present and presiding, first in the joint session, and then in the Senate chamber.

As the proceedings continued in both the House and the Senate, and with Vice President Mike Pence present and presiding over the Senate, a large crowd gathered outside the U.S. Capitol. As noted above, temporary and permanent barricades were in place around the exterior of the U.S. Capitol building, and U.S. Capitol Police were present and attempting to keep the crowd away from the Capitol building and the proceedings underway inside.

At such time, the certification proceedings still underway and the exterior doors and windows of the U.S. Capitol were locked or otherwise secured. Members of the U.S. Capitol Police attempted to maintain order and keep the crowd from entering the Capitol; however, shortly after 2:00 p.m., individuals in the crowd forced entry into the U.S. Capitol, including by breaking windows and by assaulting members of the U.S. Capitol Police, as others in the crowd encouraged and assisted those acts.

Shortly thereafter, at approximately 2:20 p.m. members of the United States House of Representatives and United States Senate, including the President of the Senate, Vice President Mike Pence, were instructed to—and did—evacuate the chambers. Accordingly, the joint session of the United States Congress was effectively suspended until shortly after 8:00 p.m. Vice President Pence remained in the United States Capitol from the time he was evacuated from the Senate Chamber until the sessions resumed.

During national news coverage of the aforementioned events, video footage which appeared to be captured on mobile devices of persons present on the scene depicted evidence of violations of local and federal law, including scores of individuals inside the U.S. Capitol building without authority to be there.

Following the events of January 6, 2021, the Metropolitan Police Department (MPD) received a tip on its tip line containing what appears to be an audio/video recording of two shorter video clips. Upon review of this video, your affiant determined both videos depicted the same individual wearing a bright orange sweatshirt, black rimmed glasses with a gold colored nose piece, and a baseball cap inside the U.S. Capitol, who was later identified as RONALD SANDLIN. SANDLIN appeared in the video with several unidentified subjects¹ in the background throughout the entirety of the video. In the first video clip, SANDLIN appeared emotional, stating “we did it.” In the second video clip, SANDLIN stated “we breached the building, we breached the building, into our Capitol.”

Further investigation revealed Twitter posts from an account named Cleavon_MD. The first post read “Meet Ronnie Sandlin who stormed the Capitol: ‘We did it We did it.’” This post contained a video that captured the same scenes and audio as that of the video in the MPD tip described above. The second post was a photo from the internet of what appeared to be SANDLIN wearing a suit. The next two photos posted on the account appeared to be screenshots from a Facebook account under the name “Ronnie Sandlin.” One screenshot contained what appeared to be videos of SANDLIN in the same bright orange sweatshirt and black rimmed glasses (see Figure 1), and the other screenshot was a comment posted from the Ronnie Sandlin Facebook account on January 6 at 9:56 PM (see Figure 2), which read “Who has a contact with TMZ and/or Epoch Times? Thanks patriots. I have the truth not the media lies. What I haven’t shown will show the REAL truth. We are not terrorists. We occupied and for the most part left that place relatively put together all things considered.”

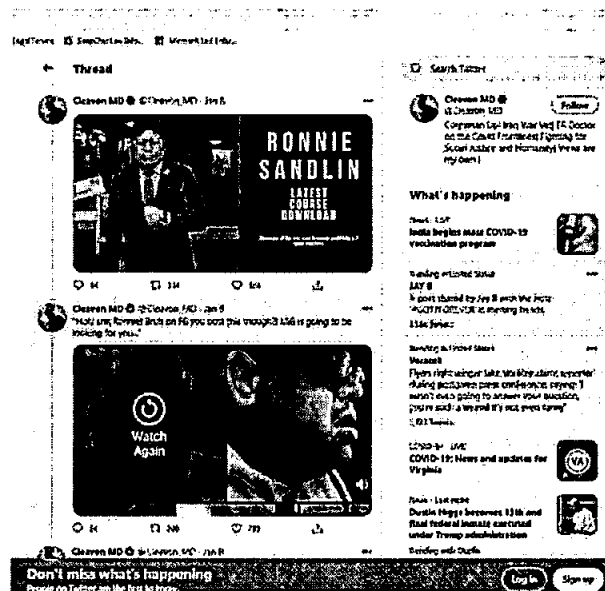


Figure 1

¹ There are numerous individuals who appear in the videos reviewed by your affiant who either have yet to be identified or have been fully identified, but for purposes of this affidavit, your affiant will refer to all individuals but SANDLIN and the U.S. Capitol Police officers as “unidentified subjects.”

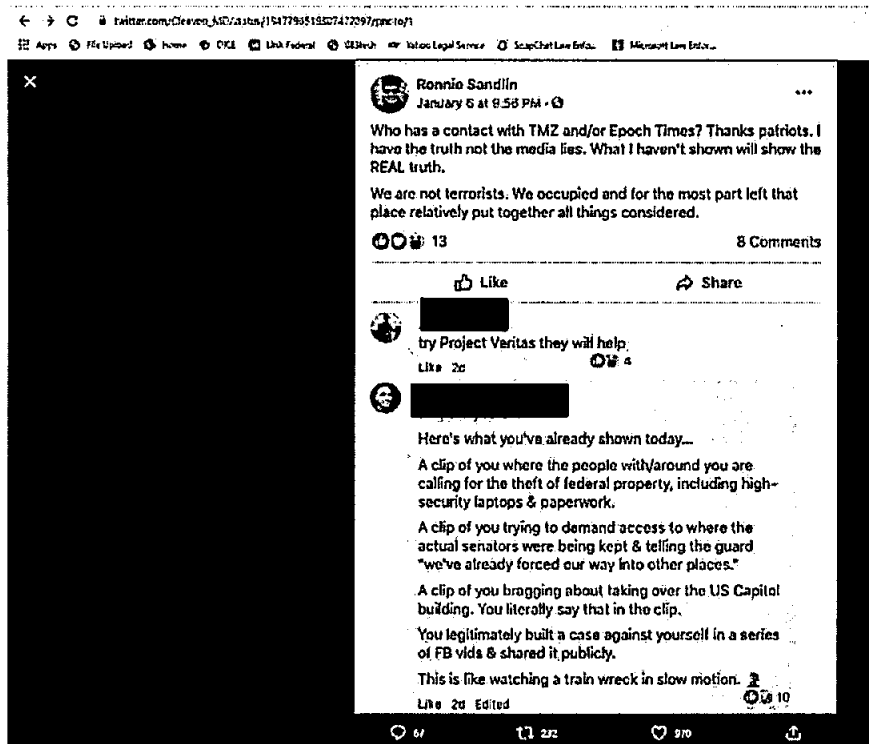


Figure 2

In response to legal process, Facebook provided subscriber information and internet protocol (IP) addresses for the “Ronnie Sandlin” Facebook account described above. In response to this subpoena, law enforcement received the following information: the account had a registered email address of icheckthisemail@gmail.com and was linked to a phone number ending in -4261. A search of records lists this -4261 phone number in connection with a “Ronald Sandlin” located in Memphis, TN. Open records searches further revealed that this email address and phone number were linked to a Facebook account with the username “@RevenueExploder” that pertained to a “Ronnie Sandlin” with the same birth date as RONALD SANDLIN, per government records.

The investigation also revealed a New Post Article posted on January 9, 2021, at 5:09 p.m., titled “Video shows rioter smoking pot in the Capitol Rotunda during siege.” Your affiant reviewed this article, which contains photos and videos, including the videos originally received in the MPD tip and photos of SANDLIN in the bright orange sweatshirt and black rimmed glasses inside the Capitol. In the videos, SANDLIN can be heard stating “we made history guys. People are smoking weed in here. Please, may I please hit that...I am smoking weed. Thank you patriot. We made history in here.” In the video, SANDLIN is observed smoking a type of rolled cigarette consistent with a “joint,” which is typically used to smoke marijuana. Screenshots of the videos can be seen below (see Figures 3 and 4).

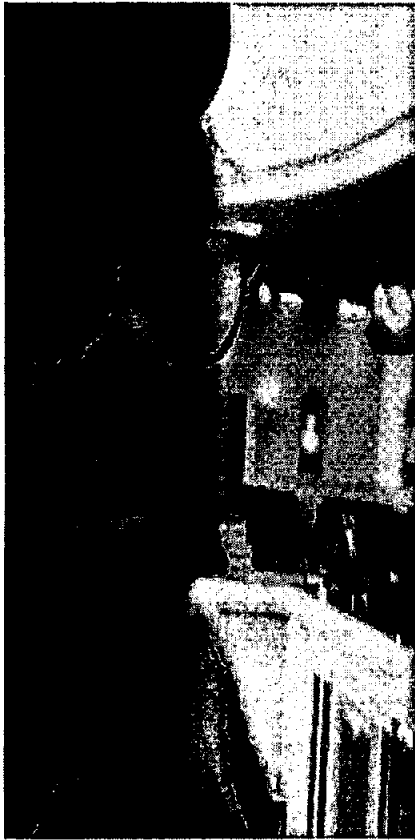


Figure 3



Figure 4

Your affiant has reviewed a copy of surveillance video footage obtained from an internal security camera covering a hallway in the U.S. Capitol Senate Gallery with a date and time stamp reading Wednesday, January 06, 2021, at 2:41:28 PM. This camera provides a view of a hallway and several sets of doors to rooms or areas out of the view of the camera. The beginning of the video clip showed several unidentified subjects in the hallway. A U.S. Capitol Police (USCP) officer (hereinafter referred to as "USCP1") is seen entering one of these sets of doors and is shortly joined by two other USCP officers ("USCP2" and "USCP3"). As part of their official duties, USCP1, USCP2, and USCP3 were clearing individuals out of rooms and securing the doors.

Approximately 27 seconds into the video clip, SANDLIN entered the view of the security camera wearing a bright orange sweatshirt, baseball cap, backpack, a second smaller bag over his shoulder, and what appeared to be camera equipment. Shortly thereafter, USCP2 and USCP3 moved toward the second set of doors to start to usher people out, while USCP1 finished locking the first set of doors. SANDLIN is seen walking next to USCP1 as he approached the second set of doors, and while USCP2 is attempting to close the second set of doors. SANDLIN is observed cutting in front of USCP1 and attempting to wrestle the door away from USCP2. This wrestling to keep the door open causes SANDLIN and several other unidentified subjects to become engaged in a shoving match with the USCP officers. SANDLIN is observed backing away from USCP2 and charging back at USCP2, while USCP2 is facing away from SANDLIN. While this shoving match transpires, the three USCPs are without backup in a hallway surrounded by what appeared to be at least 20 individuals. As the three USCPs make their way away from the crowd down the

hallway and out of view of the security camera, SANDLIN along with several others are observed on the video footage acting in an aggressive manner towards the USCPs.

Further investigation revealed another video posted to the internet of a large crowd of individuals breaching one of the doors leading into the U.S. Capitol. There are several USCP officers attempting to hold back the large surge of individuals trying to push past them to get inside the building. A much smaller group of individuals located behind the USCP officers can be seen in the video attempting to remove the USCP officers from the doorway to allow for the individuals outside the U.S. Capitol building to come inside. In the video, your affiant observed SANDLIN as part of the group of individuals already inside the U.S. Capitol and behind the USCP officers. SANDLIN is observed reaching out and attempting to rip the helmet off of a U.S. Capitol Police officer (USCP4), while USCP4 is facing away from SANDLIN and attempting to fight back the large group of individuals trying to enter the Capitol.

Your affiant has reviewed several videos and photographs from the internet of a person identified as "Ronnie Sandlin" inside the Capitol as well as a government photograph for an individual named RONALD SANDLIN. In comparing these images, the images of the "Ronnie Sandlin" captured in the internet postings are consistent with the physical appearance of SANDLIN, as seen in a government photograph of SANDLIN. In addition, the individual who appeared in several selfie photographs and videos posted to a Facebook account with the username Ronnie.Sandlin has the same distinctive glasses and appears to be consistent with the person seen in photographs inside the Capitol and on video surveillance footage appearing to wear the same glasses, as well as the government photograph of SANDLIN wearing the same distinctive glasses.

On December 23, 2020, the user of Facebook account Ronnie.Sandlin posted the following comment: "Who is going to Washington D.C. on the 6th of January? I'm going to be there to show support for our president and to do my part to stop the steal and stand behind Trump when he decides to cross the rubicon. If you are a patriot I believe it's your duty to be there. I see it as my civic responsibility. If you're going comment below or PM me so we can meet up." The user also posted: "cool man I'm driving from Memphis if you want to join. Probably gonna rent a car and drive there. Assume flights into and surrounding DC will be shutdown because they don't want people to come and they will blame in on Covid." This comment posted by the Facebook user Ronnie.Sandlin further corroborates that the user of this Facebook account is SANDLIN who, according to government records, lives within 25 miles of Memphis, TN.

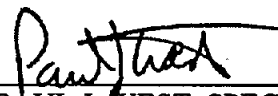
Based on the posts and information described above and a comparison of the images of the individual inside the Capitol with the photograph in government records for RONALD SANDLIN, your affiant reasonably believes that the individual seen in the Capitol building in the videos and Facebook photos is RONALD SANDLIN.

Based on the foregoing, your affiant submits that there is probable cause to believe that RONALD SANDLIN violated 18 U.S.C. § 1752(a)(1) and (2), which makes it a crime to (1) knowingly enter or remain in any restricted building or grounds without lawful authority to do; and (2) knowingly, and with intent to impede or disrupt the orderly conduct of Government business or official functions, engage in disorderly or disruptive conduct in, or within such

proximity to, any restricted building or grounds when, or so that, such conduct, in fact, impedes or disrupts the orderly conduct of Government business or official functions; (4) knowingly engages in any act of physical violence against any person or property in any restricted building or grounds; or attempts or conspires to do so. For purposes of Section 1752 of Title 18, a "restricted building" includes a posted, cordoned off, or otherwise restricted area of a building or grounds where the President or other person protected by the Secret Service, including the Vice President, is or will be temporarily visiting; or any building or grounds so restricted in conjunction with an event designated as a special event of national significance.

Your affiant submits there is also probable cause to believe that RONALD SANDLIN violated 40 U.S.C. § 5104(e)(2), which makes it a crime to willfully and knowingly (D) utter loud, threatening, or abusive language, or engage in disorderly or disruptive conduct, at any place in the Grounds or in any of the Capitol Buildings with the intent to impede, disrupt, or disturb the orderly conduct of a session of Congress or either House of Congress, or the orderly conduct in that building of a hearing before, or any deliberations of, a committee of Congress or either House of Congress; (E) obstruct, or impede passage through or within, the Grounds or any of the Capitol Buildings; (F) engage in an act of physical violence in the Grounds or any of the Capitol Buildings; and (G) parade, demonstrate, or picket in any of the Capitol Buildings.

Finally, your affiant submits there is probable cause to believe that RONALD SANDLIN violated 18 U.S.C. 231(a)(3), which makes it unlawful to commit or attempt to commit any act to obstruct, impede, or interfere with any fireman or law enforcement officer lawfully engaged in the lawful performance of his official duties incident to and during the commission of a civil disorder which in any way or degree obstructs, delays, or adversely affects commerce or the movement of any article or commodity in commerce or the conduct or performance of any federally protected function. For purposes of Section 231 of Title 18, a federally protected function means any function, operation, or action carried out, under the laws of the United States, by any department, agency, or instrumentality of the United States or by an officer or employee thereof. This includes the Joint Session of Congress where the Senate and House count Electoral College votes.


 PAUL J. WEST, SPECIAL AGENT
 FEDERAL BUREAU OF INVESTIGATION

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this __20th__ day of January 2021.

ZIA M. FARUQUI
 U.S. MAGISTRATE JUDGE